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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

\* \* \*

KARAN HINTZE, an individual,

Plaintiff,

vs.

AMICA MUTUAL INSURANCE COMPANY;  
DOES I through X; and ROE CORPORATIONS  
I through X,

Defendant.

Case No.: 2:22-cv-01425-CDS-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY  
DEADLINES**

**(THIRD REQUEST)**

Pursuant to LR IA 6-1 and LR 26-3, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case by sixty (60) days. In addition, the parties request that all other future deadlines contemplated by the Discovery Plan and Scheduling Order be extended pursuant to Local Rule.

In support of this Stipulation and Request, the parties state as follows:

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**DISCOVERY COMPLETED TO DATE**

1. On June 1, 2022, Plaintiff KARAN HINTZE (“Plaintiff”) filed her Complaint against Defendant AMICA MUTUAL INSURANCE COMPANY (“Defendant”) in the Eighth Judicial District Court, Clark County, Nevada, Case No. A-22-853404-C.

2. On August 4, 2022, Defendant filed its Answer to Plaintiff’s Complaint.

3. On September 1, 2022, Defendant removed the case to the United States District Court, District of Nevada. [ECF No. 1].

4. On October 31, 2022, the Court entered the Stipulated Discovery Plan and Scheduling Order. [ECF No. 10].

5. On December 31, 2022, Plaintiff served her FRCP 26(f) Case Conference Disclosure of Witnesses and Exhibits.

6. On January 19, 2023, Defendant served its Initial Disclosures.

7. On February 17, 2023, Plaintiff served her Supplemental FRCP 26(f) Case Conference Disclosure of Witnesses and Exhibits.

8. On March 20, 2023, Plaintiff served her Second Supplemental FRCP 26(f) Case Conference Disclosure of Witnesses and Exhibits.

9. On March 29, 2023, Plaintiff served Interrogatories and Requests for Production on Defendant.

10. On May 23, 2023, Plaintiff served her Third Supplemental FRCP 26(f) Case Conference Disclosure of Witnesses and Exhibits.

11. On July 28, 2023, Defendant served its responses to Plaintiff’s First Set of Request for Production of Documents.

12. On July 28, 2023, Defendant served its First Supplemental FRCP 26(f) Case Conference Disclosure of Witnesses and Exhibits.

**DISCOVERY REMAINING**

1. Defendant is working diligently to provide Plaintiff with Responses to Interrogatories.
2. The parties will continue to gather relevant medical records.
3. Plaintiff will take the deposition of Defendant's Rule 30(b)(6) designee(s).
4. Defendant will take the deposition of Plaintiff.
5. Defendant intends to request that Plaintiff agree to a Rule 35 physical exam.
6. The parties will designate initial expert witnesses.
7. The parties will designate rebuttal expert witnesses.
8. The parties will take the depositions of the designated expert witnesses.
9. The parties will take the depositions of any and all other witnesses garnered through discovery.
10. Any other discovery which may be determined as relevant and necessary by the parties.

**WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

The parties aver, pursuant to Local Rule 26-3, that good cause exists for the following requested extension. This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct discovery.

Defense counsel, the law firm of Alverson Taylor & Sanders, closed down and dissolved. The attorneys and support staff of Alverson Taylor & Sanders have joined the law firm of Hall & Evans, LLC. Said transition has resulted in a loss of access to client files, technology, administrative passwords/logins, etc. Said transition has delayed client communication, and interfered with the ability to review materials contained in the client file, which has in turn

caused a delay in serving Defendant's responses to Plaintiff's Interrogatories. The requested extension will allow for more complete and thorough discovery in this matter.

This is the third request for an extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the extension.

### **PROPOSED SCHEDULE**

The following is a list of current discovery deadlines and the Parties' proposed extended deadlines:

Event	Current Deadline	Proposed New Deadline
Discovery Cut-Off	11/10/2023	<b>January 9, 2024</b>
Deadline to Amend Pleadings	6/12/2023	<b>CLOSED</b>
Deadline to Disclose Initial Expert Disclosures	9/11/2023	<b>November 10, 2023</b>
Deadline to Disclose Rebuttal Expert Disclosures	10/11/2023	<b>December 11, 2023</b>
Deadline to File Dispositive Motions	12/11/2023	<b>February 9, 2024</b>
Joint Pretrial Order	1/8/2024	<b>March 8, 2024</b>

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WHEREFORE, the parties respectfully request that this Court extend all discovery deadlines by sixty (60) days as outlined in accordance with the table above.

DATED this 15<sup>th</sup> day of August, 2023.

DATED this 15<sup>th</sup> day of August, 2023.

**HALL & EVANS, LLC**

**LADAH LAW FIRM**

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**IT IS SO ORDERED**



DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: August 16, 2023

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